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COUNSEL FOR DEBTOR

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

In re:	§	Case No. 24-60504
	§	
Eric Ralls	§	
	§	Chapter 7 (converted from
Debtor	§	chapter 11)

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UNOPPOSED MOTION TO CONTINUE 2004 EXAMINATION

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TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Eric Ralls (“**Debtor**”) files this *Unopposed Motion to Continue 2004 Examination* (the “**Motion**”) seeking a continuance of the currently set 2004 Examination. In support of the Motion, Debtor states as follows:

1. On or about June 19, Ms. Areya Holder Aurzada (“**Trustee**”), the chapter 7 Trustee in this matter, filed her *Motion for 2004 Examination of Eric Ralls Pursuant to Bankruptcy Rule 2004* (the “**2004 Motion**”).
2. The Debtor did not oppose the 2004 Motion and, indeed, cooperated in the initial setting. That initial setting was for Friday, July 11, 2025.
3. The 2004 Motion requested that date, and the *Order Directing 2004 Examination of Eric Ralls* (“**2004 Order**”) explicitly ordered that the examination would take place on that date.

4. At the time Debtor initially agreed to that date, he did not realize that it conflicts with a significant medical procedure that had already been planned to occur in Tennessee on that day.

5. Counsel for the Trustee has been advised and has agreed to the continuance requested herein.

6. The parties have agreed that the 2004 examination will be reset to Monday, July 21, 2025, to begin at 9:00 a.m. This date is subject to the Debtor's health condition at the time, and the parties have agreed to communicate and cooperate to the extent this date may need to be changed further.

7. The parties have also agreed that the Debtor will endeavor to produce whatever additional documents the Trustee determines have not already been produced pursuant to a previous large production of documents by the Debtor by July 14, 2025.

8. Based on the above, the Court is requested to enter an order modifying the date of the 2004 examination – an order that will allow for the parties to agree to further adjust the dates as necessary in the interests of the health of the Debtor and in the interests of justice.

WHEREFORE, Debtor requests that the Court enter an order granting the relief requested herein, thereby excusing the Debtor from appearing on the currently set date for the 2004 examination, and continue the examination as requested herein. The Debtor requests such other and further relief to which he may show himself entitled.

**DATED this 10<sup>th</sup> day of July, 2025.**

Respectfully submitted,

**THE MITCHELL LAW FIRM, L.P.**

**/s/ Gregory W. Mitchell**

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ATTORNEYS FOR DEBTOR

**CERTIFICATE OF CONFERENCE**

I hereby certify that on July 9, 2025, I conferred with Mr. John Paul Stanford, counsel for the chapter 7 trustee in this matter, regarding the relief requested herein. Mr. Stanford indicated that the Trustee is unopposed to a continuance of the 2004 examination as requested herein.

/s/ Gregory W. Mitchell  
Gregory W. Mitchell

**CERTIFICATE OF SERVICE**

I hereby certify that on **July 10, 2025**, a true and correct copy of the foregoing was served to all parties receiving notice via the Court's ECF system.

/s/ Gregory W. Mitchell  
Gregory W. Mitchell